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CLERK OF DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
BY       

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
June 2009 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

PAUL CHALLENGER,

aka "Hilljoe,"

WILLIAM HO,

aka "Mayan2012,"

KEVIN WRIGHT,

aka "Yahl,"

DANIEL MURPHY,

aka "Yukon jock,"

MICHAEL PHARIS, and

aka "jaslovesfootball,"

Defendants.

CR No. 09

**CR09-01004**

I N D I C T M E N T

[18 U.S.C. § 2252A(g): Child  
Exploitation Enterprise;  
18 U.S.C. § 2251(d)(1)(A), (e),  
§ 2252A(a), (b)(1), (b)(2):  
Conspiracy to Advertise,  
Transport, Receive, Distribute,  
Solicit, and Possess Child  
Pornography; 18 U.S.C.  
§ 2252A(a)(5)(B): Possession of  
Child Pornography]

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

THE QUEST4MORE CHILD EXPLOITATION ENTERPRISE

1. At all relevant times, defendants PAUL CHALLENGER, also  
known as ("aka") "Hilljoe" ("CHALLENGER"), WILLIAM HO, aka

"Mayan2012" ("HO"), KEVIN WRIGHT, aka "Yahl" ("WRIGHT"), DANIEL

JAB/RED:red

1 MURPHY, aka "Yukon\_jock" ("MURPHY"), and MICHAEL PHARIS, aka  
2 "Jaslovesfootball" ("PHARIS") (collectively "defendants"), and  
3 others, were members of an Internet-based, members-only message  
4 board known as "Quest4More." The main purpose of the Quest4More  
5 message board was to provide a forum for the advertisement,  
6 transportation, receipt, distribution, and possession of child  
7 pornography. For purposes of this indictment, the term "child  
8 pornography" is as defined in Title 18, United States Code,  
9 Section 2256(8)(a). At all relevant times, Quest4More operated  
10 in Los Angeles County, within the Central District of California,  
11 and elsewhere.

12 2. The Quest4More Internet message board (hereinafter  
13 "Quest4More") is an Internet-based message board.

14 3. Quest4More was hosted by IPBFree.com. IPBFree.com is a  
15 message board hosting site that allows Internet users to set up  
16 free message boards using its site. IPBFree.com is hosted by  
17 WebNX, a commercial Internet hosting company located in Los  
18 Angeles, California.

19 4. Quest4More is dedicated to men who have a sexual  
20 interest in young children. Members can make "posts" to  
21 Quest4More, which may include, among other things, the posting of  
22 child pornography images and videos, links to child pornography,  
23 commenting on child pornography posted by other members, and  
24 "private" posts, from one member to another.

25 5. Quest4More has approximately 30 members. There is a  
26 vetting process for allowing new members to join Quest4More.

27 Members are screened to ensure that they do not pose a risk to  
28

1 Quest4More and those utilizing the message board. The members of  
2 Quest4More constituted the "Quest4More Child Exploitation  
3 Enterprise."

4 6. Quest4More members do not use their real names, but  
5 instead use screen names to mask their identities. Quest4More  
6 has a function that allows members to create an "avatar," an  
7 image that appears beside their name every time they post.  
8 Quest4More also has a function that allows members to create a  
9 "signature" that automatically appears at the end of every one of  
10 that member's posts. This signature can contain text and/or  
11 images.

12 7. At all relevant times, defendants CHALLENGER, HO,  
13 WRIGHT, MURPHY, and PHARIS were members of Quest4More.

14 8. At all relevant times, defendant CHALLENGER used the  
15 screen name "Hilljoe" to participate on Quest4More. Defendant  
16 CHALLENGER joined Quest4More on or about June 18, 2007. Since  
17 that time, defendant CHALLENGER has made more than 280 posts to  
18 other Quest4More message board users.

19 9. At all relevant times, defendant HO used the screen  
20 name "Mayan2012" to participate on Quest4More. Defendant HO  
21 joined Quest4More on or about November 7, 2007. Since that time,  
22 defendant HO has made more than 70 public posts to other  
23 Quest4More message board users. Defendant HO's avatar is a  
24 cartoon depicting a toddler straddling an ejaculating adult male  
25 penis. Defendant HO's signature line is "I believe in the power  
26 of rape." This signature appeared on all of defendant HO's posts  
27 to Quest4More.

1        10. At all relevant times, defendant WRIGHT used the screen  
2 name "Yah1" to participate on Quest4More. Defendant WRIGHT  
3 joined Quest4More on or about May 4, 2007. Since that time,  
4 defendant WRIGHT has made more than 400 posts to other Quest4More  
5 message board users. WRIGHT's signature line is "Little pussies  
6 and big dicks! Mmmm!" This signature line appeared on all of  
7 defendant WRIGHT's posts to Quest4More.

8        11. At all relevant times, defendant MURPHY used the screen  
9 name "Yukon\_jock" to participate on Quest4More. Defendant MURPHY  
10 joined Quest4More on or about May 13, 2007. Since that time,  
11 defendant MURPHY has made more than 500 posts to other Quest4More  
12 message board users.

13        12. At all relevant times, defendant PHARIS used the screen  
14 name "Jaslovesfootball" to participate on Quest4More. Defendant  
15 PHARIS joined Quest4More on or about May 18, 2007. Since then,  
16 defendant PHARIS has made more than 380 posts to other Quest4More  
17 message board users.

18                    MEANS AND METHODS OF THE QUEST4MORE

19                    CHILD EXPLOITATION ENTERPRISE

20        13. Among the means and methods by which defendants  
21 CHALLENGER, HO, WRIGHT, MURPHY, and PHARIS and other Quest4More  
22 members conduct and participate in the conduct of the affairs of  
23 the Quest4More Child Exploitation Enterprise are the following:

24            a. Members of Quest4More are encouraged and required  
25 to post images and videos directly into forums categorized by  
26 type: "Hard Core" child pornography images were to be posted in  
27 the "H/C pics" forum; "Soft Core" child pornography images were

1 to be posted in the "S/C pics" forum; child pornography videos  
2 were to be posted in the "Videos" forum; non-nude videos of  
3 children were to be posted in the "NN Videos" forum; images of  
4 children who have been ejaculated upon were to be posted in the  
5 "cummed on pics" forum; and child pornography images depicting  
6 infants and toddlers were to be posted in the "Nepi" forum, named  
7 after the Greek word for "infant." In addition, the H/C pics  
8 forum contained a sub-forum titled "more to jack off to."

9           b. Within the forums, Quest4More members can post  
10 child pornography images and videos. They can also post erotic  
11 stories about men having sex with young children.

12           c. Once a Quest4More member has made a post, any  
13 other member may post comments on the post. For instance, a  
14 member can post a picture of child pornography, and other members  
15 who view it can enter posts discussing how much they like the  
16 picture or request that similar pictures be posted.

17           d. Quest4More members communicate with one another  
18 extensively about their private collections of child pornography  
19 images, as well as their ongoing contact with children in the  
20 United States and abroad.

21           e. While members can post whatever types of child  
22 pornography they wish, many appear to prefer child pornography  
23 depicting very young, pre-pubescent children. For example, a  
24 poll posted on Quest4More asked, "If there were a line of little  
25 girls in front of you, all ready to suck you, which one would you  
26 pick first?" The possible answers ranged from one through ten  
27 years old. The winning category, with approximately 30% of the  
28

1 vote, was nine years old. The category that placed second in the  
2 poll, at approximately 15% of the vote, was three years old.

3 Another poll on Quest4More asked, "When wanking off to pics of  
4 cummed on girls what age makes you cum the hardest?" Answers  
5 included, "I prefer slightly older so I voted 8+"; "4-10"; and  
6 "3-5 is my favorite too but any PT [pre-teen] is fine."

7 f. Many Quest4More members also appear to prefer  
8 child pornography depicting children in pain. In this regard,  
9 Quest4More members frequently use the Quest4More message board to  
10 discuss their fantasies about violently raping children. For  
11 example, a poll on Quest4More asked, "What do you do with a 7yo  
12 whore in your bed?" Possible answers included the following: (1)  
13 "Regular mouthfucking and fucking her pussy"; (2) "Slap her face,  
14 spit in her face, really treats her like trash"; (3) "Bend her  
15 over and assfuck her hard for two hours"; and (4) "Tie her up and  
16 abuse her." Answers posted by Quest4More members included the  
17 following:

18 (i) "I clicked 3 then I think 1 then I'd lick her  
19 head to toe or toe to head rubbing my cock all over her sliden my  
20 cock in every hole!"

21 (ii) "I'm glad that fourth option was included,  
22 as that reflect my choice..." The post included a picture of a  
23 nude pre-pubescent girl, bound to a bed. Her arms and thighs are  
24 tied by rope, with her legs open, exposing her genitals. Her  
25 mouth is gagged.

26 (iii) "I voted to ass fuck her hard for 2 hours,  
27 but I would also fuck her pussy and make her suck my cock too. I  
28

1 would also tie her up if needed. Come to think of it, I would  
2 probably slapped her some too. So my real vote is ALL OF THE  
3 ABOVE! But damn, only 1 hour with the little slut? I need much  
4 more time, like weeks, months would be better...lol [laugh out  
5 loud]."

6 g. Another poll asked Quest4More members whether they  
7 have considered abducting a preteen girl/boy. Possible answers  
8 included the following: (1) "I've thought about it, and would  
9 absolutely do it"; (2) "I've thought about it, if circumstances  
10 were right, I'd do it"; (3) "I've thought about it, but most  
11 likely would not do it"; (4) "I haven't thought about it much,  
12 not sure if I would or not"; and (5) "I haven't thought about it  
13 and would not do it." Responses posted by Quest4More members  
14 included the following:

15 (i) "I was just curious if anyone has thoug much  
16 about just going out and snatching a little girl. If so, how old  
17 would she be, any particular type of girl, how long would you  
18 keep her? Would you be gentle and loving, or just fuck her hard  
19 and not care about her, or would it be somewhere in between those  
20 two options."

21 (ii) "If I did it, it would be on the big scale,  
22 id go to a sleep over camp, and pick up the 7-8 year olds, and  
23 fuck them all, tie them up, and rape them for hours. I know, me  
24 so bad, and a sick puppie. Thanks fort he great post everyone."

25 (iii) "don't get me wrong I luv to wack to sweet  
26 yng girls and would kiss lick suk fuk shhot my load on anyone of  
27 em, but I coiudnt force it."

1 (iv) "I voted I would do it if the place was  
2 rihjt... she would be about 5 or 6 so I could have her for many  
3 years to come and time to teach her good, so I could make really  
4 good role play movies with her. would love it if she were asian,  
5 but would settle for anything just the age is right. For sex- I  
6 would fuck her shit hard all the time. just like Tara gets  
7 abused, im kind of the same as 'daddy.'"

8 (v) "I had to go with the third option, although  
9 perhaps another option that could be provided would be 'i would  
10 if i knew i could get away with it.' And my girl would be three  
11 years old and i definitely would NOT be gentle and loving...:o) as  
12 a frame of reference, this would be the kind I'd grab." The post  
13 included a picture of a female toddler, naked on a bed.

14 (vi) Defendant HO posted "YES I WOULD." The post  
15 contained a picture of a clothed, smiling toddler girl.

16 h. Quest4More members must follow security rules  
17 regarding remaining anonymous. For instance, it is suggested  
18 that the members follow protocols that mask their IP address and  
19 location. The stated purpose for these rules is to ensure that  
20 law enforcement does not discover Quest4More or uncover its  
21 members' activities.

22 i. Quest4More members discuss security measures  
23 designed to cloak their illegal activities in secrecy, such as  
24 removing a member or suspending his account if they believe the  
25 member poses a risk of Quest4More being discovered. They also  
26 share information about law enforcement's efforts to identify  
27 individuals trading in child pornography, and they discuss how to  
28 avoid the detection of their illegal activities by law  
enforcement.



## COUNT ONE

[18 U.S.C. § 2252A(g)]

14. Paragraphs One through Thirteen of the Introductory Allegations of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

15. Between in or about May 2007, and continuing through in or about September 2009, in Los Angeles County, within the Central District of California, and elsewhere, defendants CHALLENGER, HO, WRIGHT, MURPHY, and PHARIS, and others known and unknown to the Grand Jury, knowingly and willfully engaged in a child exploitation enterprise, that is, the violation of Title 18, United States Code, Sections 2251(d)(1)(A), 2252A(a)(1), 2252A(a)(2), 2252A(a)(3), and 2252A(a)(5)(B) as part of a series of felony violations constituting at least three separate incidents and involving more than one victim. The felony violations committed by the defendants in concert with one another and the other members of the Quest4More Child Exploitation Enterprise include, but are not limited to, the following:

A. Defendant CHALLENGER

16. On or about August 19, 2008, defendant HO posted a message on Quest4More titled "Here's some yummy ones!" Under this title, defendant HO posted images of toddlers and prepubescent girls bound and gagged; an image of a toddler, with her legs spread, who was pictured with a man inserting his finger into her naked vagina; and an image of an infant with an adult male penis near her face and semen near her mouth. On or about August 21, 2008, defendant CHALLENGER posted a responsive message

1 on Quest4More, stating, "Great, never too young to be raped."

2 17. On or about September 28, 2008, an unidentified member  
3 of Quest4More posted a message titled "To Take Us to 2600,"  
4 containing a number of child pornography images, including an  
5 image of a female toddler performing oral sex on an adult male,  
6 and an image of a female toddler with her legs attached to a  
7 spread bar and a hair dryer blowing on her vagina. On or about  
8 October 5, 2008, defendant CHALLENGER posted a responsive message  
9 on Quest4More stating, "little whores need to be raped hard  
10 thanks."

11 18. On or about November 16, 2008, an unidentified member  
12 of Quest4More posted a message titled "8yo blowjob." The message  
13 contained a link to a child pornography video, and a password so  
14 members could access the video. The message also contained a  
15 sample image from the video depicting a prepubescent child  
16 performing oral sex on an adult male. On or about November 17,  
17 2008, defendant CHALLENGER posted a responsive message stating,  
18 "Not her frist time a pro at it thanks."

19 B. Defendant HO

20 19. On or about November 17, 2007, defendant HO posted a  
21 message to Quest4More titled "HELLO EVERYONE." The text  
22 accompanying the message stated, "Thanks you everyone for  
23 inviting me to this fine forum. I will be sharing my pics,  
24 videos, and thoughts to many like-minded people." The post  
25 included an image of a naked, pre-pubescent girl. She is shown  
26 standing, with her arms above her head and her legs spread. Her  
27 mouth is taped, and there are clothespins hanging from each of  
28 her nipples and from her vagina.

1        20. Between on or about November 17, 2007, and on or about  
2 November 19, 2007, a number of Quest4More members posted  
3 responsive messages to defendant HO's November 17, 2007 "HELLO  
4 EVERYONE" message welcoming defendant HO to Quest4More. On or  
5 about November 19, 2007, defendant HO posted a responsive message  
6 on Quest4More that stated, "Thanks everybody! I feel that we  
7 have every right to wank away at hardcore stuff like this when we  
8 can. In fact the harsher the fuck the more I get off. I salute  
9 to all those brave pedos that get away with posting things like  
10 that with their lil girls. (I hope some of them are kidnapped)."  
11 In this message, defendant HO posted an image of a young  
12 prepubescent girl. She is lying on her back, with her legs tied  
13 in a spread and raised position, keeping her legs open to expose  
14 her vagina. Her wrists are also bound, and she is gagged with  
15 tape across her mouth and face.

16        21. On or about May 1, 2008, defendant HO posted a message  
17 on Quest4More titled "More To Jack Off To." The message included  
18 numerous images depicting a prepubescent girl. Some of the  
19 images consisted of closeups of this prepubescent girl's bare  
20 vagina being spread apart by hands, and others showed her  
21 fondling an adult male penis. The text accompanying the message  
22 stated, "I've been holding on to these series for over a year  
23 because I've kinda promised to the guy who gave me these because  
24 this little girl is his daughter. After awhile I started to see  
25 these get out elsewhere from other traders, so I said, 'Oh what  
26 the hell...' [emoticon] So enjoy guys!"

27        22. On or about September 30, 2008, defendant HO posted a  
28 message on Quest4More titled "Another PSA." The text

1 accompanying the message stated, "Another piece I made."  
2 Attached to the message was an image depicting three nude girls,  
3 ranging from toddler age to prepubescent. One of the girls is  
4 holding an erect adult male penis in her hand; one has an adult  
5 male penis inserted into her vagina; and the third has an adult  
6 male penis resting on top of her vagina. There is text on the  
7 image reading, "Without pedophiles...these children would've stayed  
8 unwanted."

9 23. On or about January 3, 2009, an unidentified member of  
10 Quest4More using the screen name "DanDLion" posted several images  
11 of prepubescent girls exposing their vaginas, toddlers holding  
12 penises in their hands, and a prepubescent girl performing oral  
13 sex on an adult male. Under each image is the phrase "Abuse and  
14 Punish Some Toddler Cunt Today!" Each image has a number  
15 associated with it; and the image marked as number seven depicted  
16 two prepubescent girls fondling the penis of an adult male.

17 a. On or about January 17, 2009, defendant HO posted  
18 a responsive message on Quest4More to this post stating that  
19 number seven was his "fantasy."

20 b. On or about January 28, 2009, defendant PHARIS  
21 posted a responsive message stating, "thanks again, hey guys is  
22 every oine safe les check in."

23 c. On or about January 28, 2009, defendant CHALLENGER  
24 posted a responsive message stating, "hi all perverts there is so  
25 nothing new out there."

26 d. On or about January 29, 2009, defendant PHARIS  
27 posted a responsive message asking members to email him if they  
28 have the "pedo days of hte week series tha i posted upon here i

1 have lost them all and need to jack off to them loe you all and i  
2 real do miss you."

3 C. Defendant WRIGHT

4 24. On or about January 1, 2008, an unidentified member of  
5 Quest4More posted a message titled "can somebody please fill  
6 these assholes." The text accompanying the message stated,  
7 "these kidz assholes needs to gets assfucked more often. i think  
8 many of the kidz whores is not done rough enough! let's see  
9 which whores is coming to see me in my office for finding  
10 talents. We need new stars people! Fuck your kids assholes good  
11 and rough, that sorry slow-ass-fucking is not the thing we need  
12 now!" Attached to the message was an image of a naked  
13 prepubescent girl lying on a bed, spreading her legs to expose  
14 her vagina and anus. Also on or about January 1, 2008, a number  
15 of unidentified Quest4More members posted responsive messages to  
16 his post, attaching images depicting closeups of the anus of  
17 prepubescent girls, including images of prepubescent girls bound  
18 with ropes and cuffs, and images of prepubescent girls and  
19 infants being penetrated by objects and penises, and commenting  
20 on whether the anus was stretched.

21 a. On or about January 1, 2008, defendant MURPHY  
22 posted a responsive message to these posts, referring to one of  
23 the pictures depicting two children, stating, "Hmmm, what can we  
24 say about these two folx? They do try hard and their pussy looks  
25 well fucked, but im not so impressed bout their assholes. Its  
26 just OK. Hmmm, lets put them on hold. Will somebody give these  
27 kids a assfucking-lesson while i check the other children in the  
28 meanwhile?"

1           b.    On or about January 1, 2008, defendant CHALLENGER  
2 posted a responsive message stating, "shi the love of my life  
3 daddys got a big one so it is well broken in lucky daddy.

4           c.    On or about January 1, 2008, defendant WRIGHT  
5 posted a responsive message stating, "I wouldn't mind fucking  
6 every one of those tight little assholes!!!! I'm a buttt man,  
7 pariticularly!"

8           25. On or about January 3, 2008, an unidentified member of  
9 Quest4More posted a message titled "4yo gets her breakfast." The  
10 text accompanying the message stated, "Little Gillian gets her  
11 pussy checked out and gets a good breakfast before she heads to  
12 school," and the message included a link to a video and a  
13 password so other members could access it. The message also  
14 contained a sample image from the video, depicting a prepubescent  
15 girl opening her mouth to receive a penis. On or about January  
16 3, 2008, defendant WRIGHT posted a responsive message on  
17 Quest4More, stating, "What a perfect little cutie! And what a  
18 trooper...she takes it like a good little girl! Nice little  
19 vid!"

20           26. On or about February 6, 2008, an unidentified member of  
21 Quest4More posted a message titled "Vidz of kidz." The message  
22 attached a close-up image of a toddler's vagina with an adult  
23 penis pressed against her, and an image of a prepubescent girl's  
24 torso, with her vagina visible and an adult male penis  
25 ejaculating on her stomach.

26           a.    On or about February 6, 2008, another unidentified  
27 member of Quest4More posted a responsive message stating, "great  
28 collection of vidcaps ... I like the look of this video (see pic

1 attached) but have not seen it before - do you have th evide? If  
2 so can you upload please?" This message includes an image of a  
3 prepubescent girl on her hands and knees. The girl is grimacing  
4 in pain while an adult male kneels behind her and appears to be  
5 engaged in sexual intercourse with her.

6 b. On or about February 6, 2008, defendant CHALLENGER  
7 posted a responsive message stating, "thanks love to see them  
8 some again."

9 c. On or about February 7, 2008, defendant HO posted  
10 a responsive message stating, "it was posted up in the video  
11 section. her name is Valya I believe."

12 d. On or about February 7, 2008, defendant PHARIS  
13 posted a responsive message stating, "there are alot of ones i  
14 dont have looking forward to getting them you the great one."

15 e. On or about February 8, 2008, defendant WRIGHT  
16 posted a responsive message stating, "There were many more posts  
17 up before (since the beginning), but they got deleted, and we had  
18 to start again. ... Now, lets all fuck some tight little pussies  
19 and assholes, together!"

20 f. On or about February 8, 2008, defendant MURPHY  
21 posted a responsive message stating, "i luvd the squeeze of the  
22 yng sweet titties."

23 D. Defendant MURPHY

24 27. On or about July 21, 2008, defendant PHARIS posted a  
25 series of messages on Quest4More titled "ok so hers some." The  
26 messages included an image of a prepubescent girl's face bent  
27 over an ejaculating penis, a toddler holding an adult penis in  
28 her hand, and a prepubescent girl laying on her back with her

1 knees bent and spread, with an adult male helping her pull her  
2 underwear aside to expose her vagina.

3 a. On or about July 22, 2008, defendant HO posted a  
4 responsive message stating, "First one is my fav!"

5 b. On or about July 26, 2008, defendant MURPHY posted  
6 a responsive message stating, "nuttin like a nice yng helpin  
7 hand."

8 28. On or about July 28, 2008, an unidentified member of  
9 Quest4More posted a series of messages titled "Something to keep  
10 our place going...:0)." The first message included an image of a  
11 nude, prepubescent girl sitting on the stomach of a nude adult  
12 male, and holding his penis in her hand. She is wearing a leash  
13 around her neck. The text accompanying the message stated, "love  
14 the leash." Subsequent messages in the same thread included an  
15 image of a nude, prepubescent girl lying on her back, with ropes  
16 around her angles, tying her to the wall, and holding her legs  
17 apart, accompanied with the text, "love the ropes...;0)"; an  
18 image of a prepubescent girl with her pants pulled down to expose  
19 her buttocks, bending over a stool, accompanied with the text,  
20 "love the position"; and an image of a nude, prepubescent girl,  
21 lying on her back with her legs tied apart, her wrists bound  
22 together, and an object inserted in her vagina, accompanied with  
23 the text, "man, if I had her like this..." On or about July 30,  
24 2008, defendant MURPHY posted a responsive message stating,  
25 "mmmmm straddel dat nice ass! Spred da cheeks!"

26 29. On or about September 21, 2008, an unidentified member  
27 of Quest4More posted a message titled "Two New, Any More of This  
28 Little Toy?" The message included two images depicting a toddler



1 asleep on a bench, nude from the waist down, exposing her vagina.  
2 The text stated, "how about this sweet little cunt?" On or about  
3 September 23, 2008, defendant MURPHY posted a responsive message,  
4 stating, "not oging to lie, id picfk her up and go find a quite  
5 sport nd then gag her and jam my little 3 inch littel girl dick  
6 in here pussy and make her blled, lol."

7 30. On or about November 16, 2008, an unidentified  
8 defendant posted a message on Quest4More titled "8yo blowjob."  
9 The accompanying message stated, "enjoy," and it included a link  
10 to a video and a password to allow Quest4More members to access  
11 it. A sample image from the video was attached, and it depicted  
12 a prepubescent girl performing oral sex on an adult male. On or  
13 about November 22, 2008, defendant MURPHY posted a responsive  
14 message, stating, "dont ya wanna just grab her head and fuk her  
15 face!"

16 E. Defendant PHARIS

17 31. On or about February 19, 2008, defendant PHARIS posted  
18 a message on Quest4More asking other members to post violent  
19 images of child pornography. Specifically, the post stated,  
20 "anybody got an new rape or hard pussy fucking hit me."

21 32. On or about January 27, 2009, defendant PHARIS posted a  
22 series of three messages on Quest4More titled "its so nice to see  
23 you all are haing alot of fun." The first message included an  
24 image of an infant sucking on an adult male penis; the second  
25 message included a closeup image of an infant's vagina; and the  
26 third message included an image of a nude girl with an adult male  
27 penis pressed against her vagina. The text accompanying the  
28 message stated, "uhhh, this isnt for me, its for the little bsaby

1 lovers, dotn think idont look for what you all like too, the flip  
2 side of that is you know I love rape and pain where you can here  
3 them crying and begging, so if oyu hae any of those, hit me and  
4 well play."

5 33. On or about January 31, 2009, defendant PHARIS posted a  
6 message on Quest4More titled "rape hard pain," with an  
7 accompanying message requesting that Quest4More members post  
8 additional, violent child pornography. Specifically, the message  
9 stated, "come n guys lets get going post soem old stuff anything  
10 I need osme ra;ped girls who I can watch get hurt when they  
11 screem and beg please you want me to beg ok ill beg . . ."

12 34. On or about February 7, 2009, defendant PHARIS posted a  
13 responsive message to his own January 31, 2009 "rape hard pain"  
14 message stating, "where is everyone, it is so quite, nothing gong  
15 on here or anywhere else, dot tell me he feds have won, i hope  
16 not, lets post some new great stuff, come on guys pleasee."

17 35. On or about February 25, 2008, defendant PHARIS posted  
18 a message on Quest4More with the subject title "enjoy guys new  
19 little 11yo that i capped on sat." The message stated, "enjoy  
20 little cunt with no pussy hair or boobs, flat she thinks im 12, i  
21 love dumb little cutns, if you like i have lots more." The post  
22 included a link to a video at "evilshare.com."

COUNT TWO

[18 U.S.C. §§ 2251(d)(1)(A), (e); 2252A(a), (b)(1), (b)(2)]

36. Paragraphs One through Thirteen of the Introductory Allegations of this Indictment are re-alleged and incorporated by reference as though fully set forth herein.

A. OBJECTS OF THE CONSPIRACY

37. Beginning on a date unknown and continuing to in or about September 2009, in Los Angeles County, within the Central District of California, and elsewhere, defendants CHALLENGER, HO, WRIGHT, MURPHY, and PHARIS (collectively "defendants"), and others known and unknown to the Grand Jury, conspired and agreed with each other to knowingly and intentionally transport, receive, distribute, advertise, solicit, and possess child pornography, in violation of Title 18, United States Code, Sections 2251(d)(1)(A), 2251(e), 2252A(a)(1), 2252A(a)(2), 2252A(a)(3)(B), 2252A(a)(5)(B), 2252A(b)(1) and 2252A(b)(2).

B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE ACCOMPLISHED

38. The objects of the conspiracy were to be accomplished, in substance, as set forth in the Introductory Allegations, above.

C. OVERT ACTS

39. In furtherance of the conspiracy and to accomplish the objects of the conspiracy, defendants CHALLENGER, HO, WRIGHT, MURPHY, and PHARIS committed various overt acts within the Central District of California, and elsewhere, including but not limited to the following:

40. On or about September 16, 2007, defendant WRIGHT posted

1 a message on Quest4More that commented on child pornography  
2 posted by another member.

3 41. On or about November 4, 2007, defendant WRIGHT posted a  
4 message on Quest4More that discussed limiting membership on  
5 Quest4More.

6 42. On or about November 17, 2007, defendant CHALLENGER  
7 posted a message on Quest4More that commented on child  
8 pornography posted by another member.

9 43. On or about November 17, 2007, defendant HO posted a  
10 message on Quest4More that contained child pornography.

11 44. On or about November 19, 2007, defendant HO posted a  
12 message on Quest4More that contained child pornography and that  
13 saluted members who post child pornography that they produce  
14 themselves.

15 45. On or about November 26, 2007, defendant WRIGHT posted  
16 a message on Quest4More that commented on child pornography  
17 posted by another member.

18 46. On or about December 5, 2007, defendant WRIGHT posted a  
19 message on Quest4More that discussed limiting membership in  
20 Quest4More for security reasons.

21 47. On or about December 20, 2007, defendant WRIGHT posted  
22 a message on Quest4More that commented on child pornography  
23 posted by another member.

24 48. On or about January 3, 2008, defendant WRIGHT posted a  
25 message on Quest4More that comments on child pornography posted  
26 by another member.

27 49. On or about February 9, 2008, defendant HO posted two  
28 messages to Quest4More that contained child pornography.

1       50. On or about February 14, 2008, defendant HO posted a  
2 message on Quest4More that warned other Quest4More members about  
3 law enforcement efforts to combat child pornography on the  
4 Internet.

5       51. On or about February 29, 2008, defendant PHARIS posted  
6 a message on Quest4More that responded to child pornography  
7 posted by another Quest4More member.

8       52. On or about February 25, 2008, defendant PHARIS posted  
9 a message on Quest4More that directed other members to a webcam  
10 capture featuring video he had created of an 11-year-old girl.

11       53. On or about February 29, 2008, defendant PHARIS posted  
12 a message on Quest4More that asked other members to post violent  
13 images of child pornography.

14       54. On or about March 18, 2008, defendant HO posted a  
15 message on Quest4More that contained child pornography.

16       55. On or about May 1, 2008, defendant HO posted a message  
17 on Quest4More that contained child pornography.

18       56. On or about May 1, 2008, defendant HO posted a message  
19 on Quest4More that contained child pornography.

20       57. On or about May 16, 2008, defendant MURPHY posted a  
21 message on Quest4More that commented on child pornography posted  
22 by another Quest4More member.

23       58. On or about May 25, 2008, defendant MURPHY posted a  
24 message on Quest4More that commented on child pornography posted  
25 by another member.

26       59. On or about July 27, 2008, defendant MURPHY posted a  
27 message on Quest4More that responded to child pornography posted  
28 by another Quest4More member.

1           60. On or about July 30, 2008, defendant MURPHY posted a  
2 message on Quest4More that responded to child pornography posted  
3 by another Quest4More member.

4           61. On or about August 19, 2008, defendant HO posted a  
5 message on Quest4More that contained child pornography.

6           62. On August 21, 2008, defendant CHALLENGER posted a  
7 message on Quest4More that responded to child pornography posted  
8 by another Quest4More member.

9           63. On or about September 23, 2008, defendant PHARIS posted  
10 a message on Quest4More that responded to child pornography  
11 posted by another Quest4More member.

12           64. On or about September 30, 2008, defendant HO posted a  
13 message on Quest4More that contained child pornography.

14           65. On October 5, 2008, defendant CHALLENGER posted a  
15 message on Quest4More that responded to child pornography posted  
16 by another Quest4More member.

17           66. On or about October 22, 2008, defendant MURPHY posted a  
18 message on Quest4More that commented on child pornography posted  
19 by another Quest4More member.

20           67. On or about November 22, 2008, defendant MURPHY posted  
21 a message on Quest4More that commented on child pornography  
22 posted by another member.

23           68. On or about January 17, 2009, defendant HO posted a  
24 message on Quest4More that commented on child pornography.

25           69. On or about January 19, 2009, defendant HO posted a  
26 message on Quest4More in which he expressed his preference for  
27 child pornography depicting young crying children.

28           70. On or about January 29, 2009, defendant PHARIS posted a

1 message on Quest4More that asked other Quest4More members to post  
2 images of child pornography that PHARIS had previously posted.

3 71. On or about January 31, 2009, defendant PHARIS posted a  
4 message on Quest4More that asked other Quest4More members to post  
5 violent images of child pornography.

COUNT THREE

[18 U.S.C. § 2252A(a)(1)]

72. On or about January 18, 2008, in Los Angeles County, within the Central District of California, and elsewhere, defendant WILLIAM HO, also known as "Mayan2012," knowingly mailed, shipped, and transported at least one image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), in interstate and foreign commerce, by any means, including by computer.



COUNT FOUR

[18 U.S.C. § 2252A(a)(5)(B)]

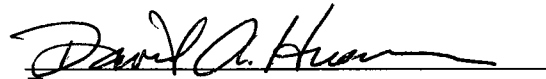
73. On or about September 22, 2009, in Los Angeles County, within the Central District of California, and elsewhere, defendant KEVIN WRIGHT, also known as "Yah1," knowingly possessed at least one image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, shipped, and transported using any means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that had been produced using materials that had been mailed, shipped, and transported in or affecting interstate and foreign commerce any means, including by computer, knowing that the images were child pornography.

COUNT FIVE

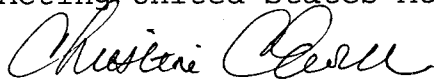
[18 U.S.C. § 2252A(a) (5) (B)]

74. On or about September 22, 2009, in Los Angeles County, within the Central District of California, and elsewhere, defendant WILLIAM HO, also known as "Mayan2012," knowingly possessed at least one image of child pornography, as defined in Title 18, United States Code, Section 2256(8) (A), that had been mailed, shipped, and transported using any means or facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that had been produced using materials that had been mailed, shipped, and transported in or affecting interstate and foreign commerce any means, including by computer, knowing that the images were child pornography.

A TRUE BILL

  
Foreperson

GEORGE S. CARDONA  
Acting, United States Attorney



CHRISTINE C. EWELL  
Assistant United States Attorney  
Chief, Criminal Division

ROBERT E. DUGDALE  
Assistant United States Attorney  
Chief, Violent and Organized Crime Section

JOEY L. BLANCH  
Assistant United States Attorney  
Deputy Chief, General Crimes Section